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F.# 2020R00617

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

JEBARA IGBARA,
also known as "Jay Mazini,"

Defendant.

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF APPLICATION FOR AN
ARREST WARRANT

(18 U.S.C. §§ 1343, 2 and 3551 et seq.)

Case No. 21-MJ-356

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EASTERN DISTRICT OF NEW YORK, SS:

WILLIAM BOLINDER, being duly sworn, affirms and states that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

On or about and between January 1, 2021 and March 15, 2021, within the Eastern District of New York and elsewhere, the defendant JEBARA IGBARA, also known as "Jay Mazini," together with others, did knowingly and intentionally devise a scheme or artifice to defraud individual owners of Bitcoin in order to obtain money and property from them by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds.

(Title 18, United States Code, Sections 1343, 2 and 3551 et seq.)

The source of your affiant's information and the grounds for his belief are as follows:¹

1. I have been a Special Agent with the FBI since September 2018. I am currently assigned to an FBI squad that investigates financial crimes. As a Special Agent, I have investigated numerous matters during the course of which I have conducted physical and electronic surveillance, interviewed witnesses, executed court-authorized search warrants and used other investigative techniques to secure relevant information regarding a variety of crimes.

2. I have personally participated in the investigation of fraud by the defendant JEBARA IGBARA, also known as "Jay Mazini," as discussed below. I am familiar with the facts and circumstances set forth below from my personal review of records and documents obtained during this investigation, and from communications and information provided to me by fellow agents and other government personnel with knowledge related to this investigation. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts of which I learned from other law enforcement agents.

3. Until in or around March 2021, the defendant JEBARA IGBARA, also known as "Jay Mazini," maintained an active social media presence on multiple social media platforms, where he promoted various business ventures with which he was associated to large numbers of followers. For example, publicly available portions of IGBARA's Instagram account showed that he had nearly a million followers on Instagram. On his Instagram account, IGBARA posted, among other things, numerous videos that purported to show him handing out

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest the defendant JEBARA IGBARA, I have not described all the relevant facts and circumstances of which I am aware.

large sums of cash to a variety of individuals, including people waiting to check out at grocery stores, individuals working at a fast food restaurant in Queens, New York and a woman he met at an airport who lost her purse. By posting such videos, IGBARA created a public persona of himself as a person of substantial means.

4. Beginning in or around January 2021, the defendant JEBARA IGBARA, also known as “Jay Mazini,” began using his social media accounts to solicit followers to sell him Bitcoin.² From January 2021 to February 2021, Bitcoin increased substantially in price, jumping from a closing price of approximately \$29,333 per Bitcoin on January 1, 2021 to \$49,248 on March 1, 2021.³ Within the same time frame, IGBARA began using his social media accounts, specifically his accounts on Twitter and Instagram, to post offers to buy Bitcoin at above-market prices. For example, on or about February 14, 2021, IGBARA posted to his Instagram an offer to buy Bitcoin at \$52,500. On that day, the market price for Bitcoin ranged from approximately \$47,105 to \$49,716. Additionally, on or about February 17, 2021, IGBARA posted to his Instagram an offer to buy Bitcoin at 3.5% to 5% above its current market price.

5. I have interviewed a witness who resides in Brooklyn, New York (“Individual #1”) who viewed posts made by the defendant JEBARA IGBARA, also known as “Jay Mazini,” to his Instagram account in which IGBARA offered to purchase Bitcoin at 5%

² Bitcoin was one form of cryptocurrency (also known as a “virtual currency”), which was a currency circulated over the Internet as a form of value. Cryptocurrencies were not issued by any government, bank or company, but were controlled through computer software operating via cryptographic technology and a large decentralized, peer-to-peer network. Cryptocurrencies maintained ledgers, which tracked the amount of each cryptocurrency held by any given user. Within that network, users could conduct cryptocurrency transactions amongst themselves in a secure, traceable manner.

³ Unless otherwise noted, Bitcoin prices cited herein are the price at the close of the date in question.

over market value. Individual #1 told me that IGBARA would at times post responses to inquiries he received from Instagram users asking why IGBARA was willing to pay over market price for Bitcoin, and that IGBARA explained in those responses that Bitcoin exchanges were limiting the quantity of Bitcoin that he could purchase. Individual #1 was physically located in the Eastern District of New York when he or she viewed these Bitcoin-related posts by IGBARA.

6. I also interviewed several individuals who transacted in Bitcoin with the defendant JEBARA IGBARA, also known as “Jay Mazini,” in response to IGBARA’s social media posts. Each individual that I interviewed describe a series of interactions with IGBARA in which IGBARA sought to have Bitcoin sent to him in exchange for U.S. dollars. In each instance, IGBARA promised to transfer the U.S. dollars via wire transfers and showed the prospective trading partners either videos or computer screen shots that purported to demonstrate that the promised wire transfers had been transmitted. In fact, with respect to each individual, IGBARA did not send wire transfers in amounts sufficient to pay for the Bitcoin he had received from his counterparty.

7. One such individual (“Individual #2”) worked for a company based outside the United States (the “Company”) that held Bitcoin and was looking to obtain U.S. Dollars. Individual #2 contacted the defendant JEBARA IGBARA, also known as “Jay Mazini,” via IGBARA’s social media profile and agreed to sell IGBARA Bitcoin. Individual #2 advised that he or she discussed the transaction with IGBARA via WhatsApp. IGBARA promised that he would wire \$195,700 in exchange for 5.049 Bitcoin from Individual #2. Copies of those WhatsApp messages show that on or about January 7, 2021, Individual #2 sent

IGBARA a message asking “U send me wire receipt and i send you the coins?” to which IGBARA responded “Of course. Of course I will send the wire confirmation receipt.”

8. In connection with the transaction, the defendant JEBARA IGBARA, also known as “Jay Mazini,” sent Individual #2: (1) a copy of his passport identification page that depicted IGBARA, and (2) a copy of a wire transfer receipt that purportedly reflected a wire transfer, in the amount of approximately \$195,700, from a bank account that IGBARA purported to control (“Bank Account #1”) to a bank account held by the Company. In exchange, on or about January 7, 2021, Individual #2 sent 5.049 Bitcoin to IGBARA’s digital currency wallet, the value of which ranged from \$183,561 to \$203,595 on that day. When no wire transfer was received by Individual #2, he or she contacted IGBARA and inquired further, and was told that the delay was due to the international nature of the transaction. Individual #2 never received the wire transfer from IGBARA, who continued to provide purported reasons that the wire transfer was being delayed.

9. I also interviewed another individual (“Individual #3”) who transferred Bitcoin to the defendant JEBARA IGBARA, also known as “Jay Mazini,” in exchange for promised payments of U.S. dollars that IGBARA never provided. Individual #3 first heard of IGBARA from his or her sibling, who had been following IGBARA on Instagram for some time prior to early 2021. In January or February 2021, Individual #3 observed IGBARA’s social media posts offering to purchase Bitcoin. In February of 2021, Individual #3 reached out to IGBARA to discuss selling Bitcoin, and the two spoke over a video call. During the call, IGBARA told Individual #3 that he had a personal net worth of \$33 million. IGBARA also showed Individual #3, by holding a second phone up to the screen of the video call, an image of

a Bitcoin wallet reflecting that IGBARA had purchased \$3 to \$4 million worth of Bitcoin the previous week.

10. Individual #3 and the defendant JEBARA IGBARA, also known as “Jay Mazini,” agreed that Individual #3 would sell IGBARA Bitcoin in a series of transactions. In connection with those transactions, IGBARA sent Individual #3 (1) a screenshot purportedly depicting an approximately \$3.135 million wire transfer confirmation from IGBARA’s TD Ameritrade Account to a bank account held by Individual #3, and (2) an image of IGBARA’s passport. In exchange, Individual #3 transferred approximately \$750,000 worth of Bitcoin to IGBARA, which Individual #3 intended to be an initial transfer or deposit for the transactions. However, Individual #3 never received the wire transfer from IGBARA. When Individual #3 complained to IGBARA about not receiving the wire transfer, IGBARA responded by transferring back to Individual #3 approximately \$390,000 worth of Bitcoin, but has to date failed to return the full amount of money provided to him by Individual #3.

11. I have reviewed account records for a TD Ameritrade Bank Account held in the name of the defendant JEBARA IGBARA, also known as “Jay Mazini.” Those records reflect that on February 8, 2021, the date IGBARA sent the wire transfer confirmation purporting to reflect a \$3,135,804.00 transfer to Individual #3, the balance in the account was approximately \$162.60. Based on this information, and the fact that no wire transfer was ever received by Individual #3, I believe that the wire transfer confirmation was fraudulent.

12. I also interviewed another individual (“Individual #4”) who transferred Bitcoin to the defendant JEBARA IGBARA, also known as “Jay Mazini,” in exchange for promised payments of U.S. dollars that IGBARA never provided. In or about January 2021, a business partner (the “Partner”) of Individual #4 saw a social media posting by IGBARA

indicating IGBARA's desire to purchase Bitcoin. The Partner then placed Individual #4 in contact with IGBARA via WhatsApp. Individual #4 has informed me that he or she negotiated a transaction with IGBARA in which IGBARA would pay him or her approximately \$2.56 million in exchange for approximately 50 Bitcoin. Individual #4 described to me that on or about January 13, 2021, IGBARA sent Individual #4 a video, depicting a computer monitor that displayed a series of wire transfer confirmation pages totaling approximately \$2.56 million, and that IGBARA told Individual #4, via WhatsApp message, that this money was to pay for the Bitcoin. Individual #4 then transferred approximately 54 Bitcoin to IGBARA. Individual #4 told me that other than payments totaling approximately \$500,000, he or she has yet to receive the balance of the \$2.56 million purportedly transferred by IGBARA, and, according to Individual #4, IGBARA has provided multiple, varying explanations for the failure of the wire transfers to arrive.

WHEREFORE, your affiant respectfully requests that an arrest warrant be issued for the defendant JEBARA IGBARA, also known as "Jay Mazini," so that he may be dealt with according to law.

William Bolinder
WILLIAM BOLINDER
Special Agent, Federal Bureau of Investigation

Sworn to before me this
23 day of March, 2021

Sanket Bulsara

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THE HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK